

Exhibit F

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WASHINGTON:

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

**NWDC RESISTANCE AND COALITION OF ANTI-RACIST
WHITES,**

PLAINTIFF,

VS.

CASE NO. 3:18-CV-05860-JLR

**IMMIGRATION & CUSTOMS ENFORCEMENT, TAE D.
JOHNSON, IN HIS OFFICIAL CAPACITY AS ACTING
DIRECTOR OF IMMIGRATION AND CUSTOMS ENFORCEMENT;
AND ALEJANDRO MAYORKAS, IN HIS OFFICIAL CAPACITY
AS SECRETARY OF HOMELAND SECURITY,**

DEFENDANT.

**ZOOM DEPOSITION OF,
MELESIO MORALES MATA
AND HOSTED BY COUNTY COURT REPORTERS, INC.**

**FRIDAY, SEPTEMBER 22, 2023
10:07 A.M.**

**UNITED STATES ATTORNEY'S OFFICE
700 STEWART STREET
SUITE 5220
SEATTLE, WASHINGTON 98101**

1 APPEARANCES

2 ON BEHALF OF THE PLAINTIFF,

3 NWDC RESISTANCE AND COALITION OF ANTI-RACIST

4 WHITES AND APPEARING BY ZOOM:

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1 A. No, go ahead.

2 Q. I was going to say take all the time
3 you need to read this paragraph that starts with
4 the bullet points at Melesio Morales Mata, take
5 all the time you need to read it and let me know
6 when you're done.

7 A. Okay.

8 (WHEREUPON, the Witness examined the document
9 previously marked Exhibit-1 for identification.)

10 A. Okay yes. Yes, I read that.

11 Q. Okay.

12 A. I mean.

13 Q. Now I want to focus on that last
14 sentence, it says although he continues to fear
15 retaliation, he recently began participating in
16 La Resistencia once again because he wants to
17 prevent others from facing the same retaliation
18 he endured. Did I read that correctly?

19 A. Yes.

20 Q. And as I said, this discovery response
21 was provided to us by La Resistencia in this
22 litigation. Was La Resistencia correct when they
23 indicated that you recently began participating
24 in La Resistencia once again because you want to
25 prevent others from facing the same retaliation

1 **you endured?**

2 A. Like this like, the last part I would
3 say like not sure, because I don't feel like I'm
4 doing nothing right now, I'm just, I'm not
5 thinking of doing it, I mean, Wendy wanting to,
6 Wendy that it says after I recent, I mean Wendy
7 didn't want me to come back, he, she text me, or
8 call me, or like by messenger, but I would say
9 no, I'm, I'm not, I don't even say nothing, I
10 just don't want to deal right now with which is
11 my family, me and my family I worry about.

12 Q. **You want to focus on your family, your
13 work, and you right now?**

14 A. Yes, hundred percent.

15 Q. **Okay.**

16 A. And my kids, my kids, they do sports so
17 like I'm really, all the free time that I have is
18 for my kid's sports.

19 Q. **So the reason you don't want to
20 participate right now is because you want to
21 focus on your family, your kids, your work, and
22 yourself, is that correct?**

23 A. Well I'm not, that's, that's one thing
24 that I put on there, there are things like I got
25 scared, I got scared, that's the reality, they

1 CERTIFICATE OF REPORTER AND SECURE ENCRYPTED
2 SIGNATURE AND DELIVERY OF CERTIFIED TRANSCRIPT
3 I, **COLLEEN GREGORY-GETTEL**, Notary Public, do
4 hereby certify that the forgoing matter was reported
5 by stenographic and/or mechanical means, that same
6 was reduced to written form, that the transcript
7 prepared by me or under my direction, is a true and
8 accurate record of same to the best of my knowledge
9 and ability; that there is no relation nor employment
10 by any attorney or counsel employed by the parties
11 hereto, nor financial or otherwise interest in the
12 action filed or its outcome.

13 This transcript and certificate have been
14 digitally signed and securely delivered through our
15 encryption server.

16 IN WITNESS HEREOF, I have here unto set my hand
17 this 3RD day of OCTOBER, 2023.

18

19



20
21 /s/ COLLEEN GREGORY-GETTEL

22 COURT REPORTER / NOTARY

23 NOTARY REGISTRATION NUMBER: 7965787

24 MY COMMISSION EXPIRES: 07/31/2025